

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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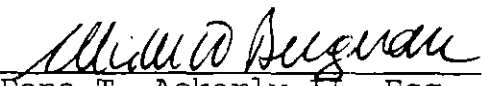
POSTAL RATE AND FEE CHANGES, 1997

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) Docket No. R97-1
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THE DIRECT MARKETING ASSOCIATION, INC.'S FOLLOW-UP
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE UNITED STATES POSTAL SERVICE (DMA/USPS-2-10)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached follow-up interrogatories and requests for production of documents to the United States Postal Service (DMA/USPS-2-10). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,


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September 22, 1997

DMA/USPS-T-2. Please refer to the Postal Service's response to DMA/USPS-T14-34b where it states that "in comparison with MODS, the numbers used by different BMCs to refer to various operations are much less uniform across facilities." Please provide the operation codes or numbers used by BMCs to describe the various mail processing operations.

DMA/USPS-T-3. Please refer to the Postal Service's response to DMA/USPS-T14-34b where it lists various categories for operations, but notes that the manual letter (no. 045) and manual flat operations categories (no. 075) "are no longer in effect. Most facilities do not report hours or workload in those operations."

- a. Please explain why BMC facilities do not report data for these operations.
- b. Please explain the full extent to which BMCs report data on workhours or workload for flat or letter processing operations (including automated, mechanized and manual activities).

DMA/USPS-4. Please refer to the Postal Service's response to DMA/USPS-T14-34(b) where it discusses workhours at BMCs.

- a. What percentage of workers are clocked into a base operation for an entire tour?
- b. What percentage of workers actually work in one base operation for an entire tour?
- c. When an employee moves between operations during their tour, what percentage of such moves are calculated by (i) clock rings or (ii) use of Form 2345 by their supervisor?
- d. Please explain fully why some moves are calculated by clock rings and others by the Form 2345.
- e. What safeguards are in place to ensure the reliability that moves by employees are accurately reflected on either the clock rings or Form 2345?

DMA/USPS-5. Please refer to the Postal Service's response to DMA/USPS-T14-34(b) where it states, "For manual operations, the workload measures are derived from the type and number of containers sorted, which is collected as the containers are being dumped. Conversion factors are used to estimate the number of pieces associated with the number of containers processed. Some of these conversion factors are fairly standard

nationwide, while others exhibit more variation based on local equipment and handling practices."

- a. Please list the manual operations for which conversion factors are used (including, but not limited to, NMOs, IPPs, and 115s).
- b. Please describe the conversion factors used in each operation.
- c. When were these conversion factors last revised?
- d. Do these conversion factors assume that the containers are full?

DMA/USPS-6. Please refer to the Postal Service's response to DMA/USPS-T14-34(b).

- a. Please list all mechanized operations for which conversion factors are used (including, but not limited to, NMOs and 115s).
- b. Please describe the conversion factors used in each mechanized operation.
- c. When were these conversion factors last revised?
- d. Do these conversion factors assume that the containers are full?

DMA/USPS-7. Please refer to the Postal Service's response to DMA/USPS-T14-34(b). Please describe in greater detail how TEP (Total Equivalent Pieces) are calculated, including the determination of the weight to be given to pieces processed on different operations.

DMA/USPS-8. Please refer to the Postal Service's response to DMA/USPS-T14-34(b) concerning reporting under PIRS.

- a. Please describe what it means by "Headquarters routine."
- b. Please explain when the "Headquarters routine" would be run on a (i) preliminary, (ii) revised or (iii) finalized basis.

DMA/USPS-9. Please refer to the Postal Service's response to DMA/USPS-T14-34(b) concerning data reliability under PIRS.

- a. Please explain the "steps" that are taken by Supervisors to ensure that operation workhours are accurately recorded.

- b. Have there been instances where the ending inventory for the supervisor from the prior shift is not equal to the beginning inventory for the next shift? If so, please explain fully.
- c. Please explain the manner in which "obvious reporting errors or questionable observations" are detected and corrected by local staff and the frequency of such errors or observations.
- d. Please explain the manner in which "potential errors and discrepancies" are detected and corrected by Headquarters personnel and the frequency of such errors or discrepancies.

DMA/USPS-10. Please identify the individual who provided the Postal Service's responses to DMA/USPS-T14-34 and DMA/USPS-2-9.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 (section 3001.12) of the Postal Rate Commission's Rules of Practice and Procedure and Rule 3 of the Commission's Special Rules of Practice in this proceeding.



Michael D. Bergman

September 22, 1997